

EXHIBIT 25

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California Department of Justice

Silva, Ramon

ROI 05 - BI-LA2022-00016 - ZHOU, Yang - wit

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7 INVESTIGATOR JASON CHILD: Investigator
8 Jason Child, C H I L D with the California
9 Highway Patrol, Southern Division Investigative
10 Services Unit.

11 INTERPRETER OFFICER LIU: Officer Liu
12 assigned to CHP Baldwin Park Area office, and a
13 Mandarin-certified speaker.

16 YANG ZHOU: My name is a Yang Zhou. My
17 first name is Y A N G. My last name is Z H O U.
18 And my birthday is November 28, 1989. And my job
19 is a truck driver.

20 INTERPRETER OFFICER LIU: All right.
21 So basically trying to ascertain what he observed
22 on the roadway.

23 YANG ZHOU: (Speaking in Mandarin)

24 INTERPRETER OFFICER LIU: Okay, so it
25 was heavy traffic when he's trying to connect to

1 710. So he's trying to connect from 105
2 westbound to 710 southbound through heavy
3 traffic. When he observed that party, he also
4 observed a patrol vehicle already on scene and
5 there was interaction going on between the party
6 and the police officer. On his left side, there
7 was another patrol vehicle drove past him.

8 So when he got, when he stopped on
9 scene, he observed the officer. The officer was
10 already outside his vehicle. The officer had his
11 right hand raised and advising the party to stop.

12 The party was standing to the right
13 side of his truck facing in a westerly direction.
14 Officer's patrol vehicle was to the left front.
15 So it will be, that would be what? South. So
16 this is a westbound, southwest, so southwest of
17 the relation to his truck. Officer already
18 standing outside, raising his right hand telling
19 the party to stop.

20 So when officer told him to stop, he
21 was charging at the officer with arm raised to
22 the front of his body. So fist was clinched and
23 was charging towards the officer. And so the
24 party and the officer was approximately 5 to 6
25 feet apart.

1 Okay. The officer that was closer to
2 him discharged his firearm and the officer behind
3 him also got out of the car and discharged the
4 firearm.

5 Correction on the previous statement.
6 He didn't see the officer exit the vehicle, the
7 second officer, but the second officer to the
8 back of his patrol vehicle also discharged a
9 firearm.

10 So he heard a total of four shots
11 approximately. So he witnessed the whole thing
12 in the driver's seat of his truck.

13 So he has more to add. So after the
14 discharge of firearm, he saw the officer back up
15 a little bit and then later re-approach the party
16 that was on the floor. The officer did approach
17 the suspect and attempt to resuscitate the
18 vehicle -- I mean the party by pressing his arms
19 on the one. One officer approached the party
20 that was down the ground and tried to push on his
21 chest and the other officer approached them to
22 make sure they are all right.

23 And so about 3 to 4 meters back to
24 where the party was, there was another vehicle
25 possibly belongs to this, this party. So that

1 vehicle was stopped further back with the door
2 open. That's why he assumed that car belongs to
3 that party. And he observed the party was
4 wandering on the, on the roadway. I'm going to
5 try to ascertain in what direction he was
6 wandering.

7 So he was pacing in lane in a northern
8 direction and southerly direction to the lane on
9 his right side. So I think that's the Number 2
10 Lane of the connector road. So he was walking
11 towards a northerly direction and turned around,
12 walked in a southerly direction. But he remained
13 in that lane.

14 INVESTIGATOR JASON CHILD: In the
15 Number 2 Lane?

16 INTERPRETER OFFICER LIU: Number 2 Lane
17 of the connector. So whatever the slow lane was.

18 INVESTIGATOR JASON CHILD: Yeah.

19 INTERPRETER OFFICER LIU: So it's to
20 the right side of his truck, big rig.

21 SPECIAL AGENT TONY BACA: For
22 clarification purposes, he said he saw two
23 officers shooting?

24 YANG ZHOU: (Speaking in Mandarin)

25 INTERPRETER OFFICER LIU: So he

1 witnessed two officers with both guns drawn, but
2 he was unsure if both officers discharged their
3 firearms, but he did hear total of four shots.

4 INVESTIGATOR JASON CHILD: What color
5 was the firearm?

6 YANG ZHOU: (Speaking in Mandarin)

7 INTERPRETER OFFICER LIU: Both officers
8 had black guns, pistols. It's about 3 to 4
9 meters back before he stopped at that location.
10 He already witnessed the party standing outside
11 the car and the police was already trying to
12 contact the party.

13 INVESTIGATOR JASON CHILD: The police
14 are trying to contact the party?

15 YANG ZHOU: (Speaking in Mandarin)

16 INTERPRETER OFFICER LIU: He already
17 saw the officer has his right arm, the right hand
18 raised and advising the party to stop, or at
19 least appears to be advising the party to stop.

20 SPECIAL AGENT TONY BACA: How many
21 times did the officer to talk to the individual?

22 YANG ZHOU: (Speaking in Mandarin)

23 INTERPRETER OFFICER LIU: He only heard
24 one time the officer said stop.

25 SPECIAL AGENT TONY BACA: And is that

1 the same officer that shot?

2 YANG ZHOU: (Speaking in Mandarin)

3 INTERPRETER OFFICER LIU: So after the

4 -- the officer in the front had his hand raised,

5 advising the party to stop. Then the party

6 charged at him. He withdraw his gun and shot at

7 the party. Then he saw the second officer

8 approach. From his angle, he only saw that

9 officer after the fact, but the gun was drawn,

10 but he did not see the second officer discharge

11 the firearm.

12 INVESTIGATOR JASON CHILD: How long did
13 this take, the whole incident?

14 YANG ZHOU: (Speaking in Mandarin)

15 INTERPRETER OFFICER LIU: About 30

16 seconds from the moment he first saw the party,

17 about 30 seconds.

18 So he has a vantage point from his
19 cabin because it's higher than usual. So he
20 observed the incident a little bit prior before
21 he arrived next to the scene.

22 SPECIAL AGENT TONY BACA: Anything
23 happen prior to arriving to the scene?

24 YANG ZHOU: (Speaking in Mandarin)

25 INTERPRETER OFFICER LIU: Nothing

1 happened. But he advised that party just seems a
2 little intoxicated as he was wandering, like I
3 said, in a northerly direction, southerly
4 direction in the Number 2 Lane of the connector
5 road.

6 And he advised other than the initial
7 patrol unit on scene, there was additional two-
8 man patrol vehicle with lights passing him on the
9 left side. And that prior to the shooting, two
10 more, two more units drove past this car, or
11 truck.

12 INVESTIGATOR JASON CHILD: How many
13 officers were present?

14 YANG ZHOU: (Speaking in Mandarin)

15 INTERPRETER OFFICER LIU: So he's
16 claiming after the shooting, other than the two
17 officers on scene, about four or five seconds
18 later, there was already additional units on
19 scene, but he can't recall how many officers was
20 present on the scene.

21 SPECIAL AGENT TONY BACA: Was the
22 party, you mentioned the party, decedent, the
23 suspect, was he holding anything in his hands?

24 YANG ZHOU: (Speaking in Mandarin)

25 INTERPRETER OFFICER LIU: So from his

1 angle, he didn't see, or at least observe any
2 object in the party's hand as he has a clenched
3 fist, both clenched fists.

4 SPECIAL AGENT TONY BACA: When the
5 officer was giving him commands, was he
6 listening? Was he obeying the commands?

7 YANG ZHOU: (Speaking in Mandarin)

8 INTERPRETER OFFICER LIU: He wasn't
9 following the command. The moment, the moment
10 the officer advised him to stop, he quickly
11 charged towards the officer.

12 SPECIAL AGENT TONY BACA: He charged.
13 How fast was he moving, about?

14 YANG ZHOU: (Speaking in Mandarin)

15 INTERPRETER OFFICER LIU: So prior to
16 office telling him to stop, he was walking. And
17 when the officer tell him to stop, he suddenly
18 charged towards the officer with the clinched
19 fists. He doesn't know the speed, so I don't
20 know. Do you remember the distance? I don't
21 recall the distance.

22 SPECIAL AGENT TONY BACA: Ask him.

23 YANG ZHOU: (Speaking in Mandarin)

24 INTERPRETER OFFICER LIU: He said about
25 five. So the officer was standing behind his

1 opened patrol vehicle door and he advised the
2 party to stop. And the party was approximately
3 you said two feet -- about five feet and he saw
4 the party charging towards the officer with
5 clenched fists.

8 YANG ZHOU: (Speaking in Mandarin)

9 INTERPRETER OFFICER LIU: He didn't say
10 anything. He said that party appears to be
11 intoxicated or at least under the influence of
12 something because he was wandering on the roadway
13 and pacing from north to south.

16 INTERPRETER OFFICER LIU: He was on the
17 right lane. According to him, it was next to his
18 truck. So that would be the Number 2 Lane of the
19 connector road or the slow lane because it's
20 right before the main line as well. So I don't
21 know if --

22 INVESTIGATOR JASON CHILD: It would be
23 considered -- for our purposes, it would be
24 considered the connector.

25 | INTERPRETER OFFICER LIU: So it would be

1 the Number 2 Lane of the connector road.

2 SPECIAL AGENT TONY BACA: And anything
3 else. Did he observe anything else?

4 YANG ZHOU: (Speaking in Mandarin)

5 INTERPRETER OFFICER LIU: Okay. He
6 advised when the party charged towards the
7 officer, the officer actually took a step back
8 before he fired the firearm.

9 SPECIAL AGENT TONY BACA: Did he see
10 anybody with the yellow gun or anything? A taser
11 or anything?

12 YANG ZHOU: (Speaking in Mandarin).
13 No, I didn't see.

14 INTERPRETER OFFICER LIU: No, he didn't
15 observe any officer holding a yellow weapon like
16 this. So he never experienced anything like
17 this. So the only thing he can recall was just a
18 black, black weapon.

19 SPECIAL AGENT TONY BACA: And then did
20 he take cover?

21 YANG ZHOU: (Speaking in Mandarin)

22 INTERPRETER OFFICER LIU: No, he was in
23 shock. So he froze. He never ducked down.

24 SPECIAL AGENT TONY BACA: How long had
25 he been working then?

1 YANG ZHOU: (Speaking in Mandarin)

2 INTERPRETER OFFICER LIU: Okay. So he
3 started working or left the warehouse at 10:30 in
4 the morning and when he got on scene it was
5 approximately 11:30, so only one-hour apart.

6 SPECIAL AGENT TONY BACA: That's his
7 normal shift?

8 YANG ZHOU: (Speaking in Mandarin)

9 INTERPRETER OFFICER LIU: So his normal
10 working hours is 2 a.m. to 2 p.m., a 12-hour
11 shift. So it is still within his normal working
12 hours.

13 SPECIAL AGENT TONY BACA: Okay. Any
14 other questions?

15 INTERPRETER OFFICER LIU: So I asked
16 him if the officer is able to avoid, because he's
17 charging him. He said the distance was too close
18 and there's no way for an officer to avoid.

19 SPECIAL AGENT TONY BACA: Anything else
20 he wants to add?

21 YANG ZHOU: No, no. I think that's it.

22 SPECIAL AGENT TONY BACA: And you
23 called your dispatch when this whole thing
24 happened?

25 YANG ZHOU: (Speaking in Mandarin)

1 INTERPRETER OFFICER LIU: So he advised
2 the dispatch there was a shooting on the freeway.
3 And he remained on scene.

4 SPECIAL AGENT TONY BACA: Does he
5 remember when the shooting happened?

6 INTERPRETER OFFICER LIU: Does he
7 remember what?

8 SPECIAL AGENT TONY BACA: Does he what
9 time it was?

10 YANG ZHOU: (Speaking in Mandarin)

15 SPECIAL AGENT TONY BACA: Okay.

16 YANG ZHOU: (Speaking in Mandarin)

20 SPECIAL AGENT TONY BACA: Thank you for
21 your time, appreciate it. This concludes our
22 interview at approximately 1740 hours. Thank
23 you, sir, appreciate it. And thank you for
24 interpreting.

25 (Interview concluded)

1 C E R T I F I C A T I O N
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3 I, Sonya Ledanski Hyde, certify that the
4 foregoing transcript is a true and accurate
5 record of the proceedings.
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8
9
10
11 Veritext Legal Solutions
12 330 Old Country Road
13 Suite 300
14 Mineola, NY 11501
15
16 Date: May 27, 2022
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[05 - door]

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[today - zhou]

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California Code of Civil Procedure

Article 5. Transcript or Recording

Section 2025.520

(a) If the deposition testimony is stenographically recorded, the deposition officer shall send written notice to the deponent and to all parties attending the deposition when the original transcript of the testimony for each session of the deposition is available for reading, correcting, and signing, unless the deponent and the attending parties agree on the record that the reading, correcting, and signing of the transcript of the testimony will be waived or that the reading, correcting, and signing of a transcript of the testimony will take place after the entire deposition has been concluded or at some other specific time.

(b) For 30 days following each notice under subdivision (a), unless the attending parties and the deponent agree on the record or otherwise in writing to a longer or shorter time period, the deponent may change the form or the substance of the answer to a question, and may either approve the transcript of the deposition by signing it, or

refuse to approve the transcript by not signing it.

(c) Alternatively, within this same period, the deponent may change the form or the substance of the answer to any question and may approve or refuse to approve the transcript by means of a letter to the deposition officer signed by the deponent which is mailed by certified or registered mail with return receipt requested. A copy of that letter shall be sent by first-class mail to all parties attending the deposition.

(d) For good cause shown, the court may shorten the 30-day period for making changes, approving, or refusing to approve the transcript.

(e) The deposition officer shall indicate on the original of the transcript, if the deponent has not already done so at the office of the deposition officer, any action taken by the deponent and indicate on the original of the transcript, the deponent's approval of, or failure or refusal to approve, the transcript. The deposition officer shall also notify in writing the parties attending the deposition of any changes which the deponent timely made in person.

(f) If the deponent fails or refuses to approve the transcript within the allotted period, the

deposition shall be given the same effect as though it had been approved, subject to any changes timely made by the deponent.

(g) Notwithstanding subdivision (f), on a reasonable motion to suppress the deposition, accompanied by a meet and confer declaration under Section 2016.040, the court may determine that the reasons given for the failure or refusal to approve the transcript require rejection of the deposition in whole or in part.

(h) The court shall impose a monetary sanction under Chapter 7 (commencing with Section 2023.010) against any party, person, or attorney who unsuccessfully makes or opposes a motion to suppress a deposition under this section, unless the court finds that the one subject to the sanction acted with substantial justification or that other circumstances make the imposition of the sanction unjust.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE STATE RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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